

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
Plaintiff,)	No.: 23-cv-1851
)	
v.)	
)	
Cook County Sheriff Thomas Dart, et al.)	Judge Tharp, Jr.
)	
Defendants.)	
)	

**AGREED MOTION TO MODIFY BRIEFING SCHEDULE FOR
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Agreed Motion for Extension of Time to File Response in Opposition to Plaintiff's Motion for Class Certification, state as follows:

1. This motion is agreed, pursuant to email communications between Defendants' Counsel Plaintiff's counsel on July 7, 2023.
2. On May 26, 2023, this Court issued an order setting the following briefing: Defendants' Response in Opposition to Plaintiff's Motion due on or before July 10, 2023; and Plaintiff's Reply in Support due on or before July 24, 2023. ECF No. 11.
3. This is the first request to modify the briefing schedule.
4. Defendants request a 7 (seven) day extension, until July 17, 2023, to file their Response in Opposition to Plaintiff's Motion for Class Certification (May 9, 2023) ECF No. 7.
5. Plaintiff requests a 9 (nine) day extension, until August 2, 2023, to file a Reply in Support of Plaintiff's Motion.

6. Defendants are diligently working to complete their Response to Plaintiff's motion and require additional time to coordinate details of the Response with their client.
7. Under Rule 6(b), this Court may, for good cause, extend the time "[w]hen an act may or must be done." Fed. R. Civ. P. 6(b).
8. Not granting an extension of time would prejudice Defendants because the current July 10, 2023, deadline will not allow sufficient time to properly prepare and submit Defendants' brief..
9. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. Defendants' Agreed Motion to Modify Briefing Schedule is granted;
2. Defendants' Response in Opposition to Plaintiff's Motion for Class Certification shall be filed by July 17, 2023; and
3. Plaintiff's Reply in Support of its Motion for Class Certification shall be filed by August 2, 2023.

Respectfully Submitted,

Defendants

By: /s/ Jason E. DeVore
Jason E. DeVore, One of the Attorneys
for Defendants

DEVORE RADUNSKY LLC

Jason E. DeVore (ARDC # 6242782)
Troy S. Radunsky (ARDC # 6269281)
Zachary G. Stillman (ARDC # 6342749)
230 W. Monroe Street, Ste. 230
Chicago, IL 60606
(312) 300-4479 telephone
jdevore@devoreradunsky.com
tradunsky@devoreradunsky.com
zstillman@devoreradunsky.com

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that Defendant's Motion for Extension of Time to File Answer or Other Responsive Pleading was filed on July 7, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman